

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BRIAN JOSEPH GREF, : CIVIL ACTION NO.  
Plaintiff, : 1:20-cv-05589-GBD-DCF  
-against- :  
**NOTICE OF MOTION**  
**FOR SANCTIONS**  
AMERICAN INTERNATIONAL INDUSTRIES, :  
*individually and as successor-in-interest for the* :  
CLUBMAN BRAND, and to THE NESLEMUR :  
COMPANY and PINAUD COMPANY, *et. al.*, :  
Defendants. :  
**HEARING DATE:**  
**JUNE 1, 2023**

**PLEASE TAKE NOTICE** that on **Thursday, June 1, 2023, at 9:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff will move, pursuant to Federal Rule of Civil Procedure 26 and the inherent authority granted to this Court, before the Honorable Valerie Figueredo, Magistrate Judge of the Southern District of New York, at the United States Courthouse in New York, New York, for an Order sanctioning Defendant American International Industries or its counsel, and for any other relief which this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that Plaintiff will rely upon the annexed Memorandum of Law and Declaration in support of his application.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested if opposition is filed.

Dated: New York, New York  
May 18, 2023

SIMMONS HANLY CONROY

Olivia P. Kelly  
Olivia P. Kelly, Esq.

Olivia P. Kelly, Esq.  
112 Madison Avenue, 7<sup>th</sup> Floor  
New York, New York 10016-7416  
Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of May 2023, I electronically filed the forgoing with the Clerk of the Court via the CM/ECF system, which will send a notice of the electronic filing to all Counsel of Record.

*/s/ Olivia P. Kelly*